

EXHIBIT B

Exhibit B: Testimony Proving the Borrowed Servant Doctrine Precludes Liability

<p>The U.S. Army set intelligence priorities and dictated/trained interrogators regarding the rules and procedures for interrogations, which applied identically to military and CACI interrogators.</p>	
<p>Torin Nelson</p>	<p>Q. The Army chain of command also established the interrogation rules of engagement for interrogations at Abu Ghraib prison? A. Yes. Q. And those applied both to military interrogators and CACI interrogators? A. That's correct.</p> <p>4/15/24 PM Trial Tr. at 108:14-19.</p>
<p>MG Taguba</p>	<p>Q. And can you tell the jury, what was the policy of the United States government with respect to the infliction of abuse of detainees at that time? A. Against civilians, we did not question that at all. We left that to the commanding general of CJTF to provide the policy and command and control and military policy for general contractors.</p> <p>4/16/24 PM Trial Tr. at 17:8-13.</p>
<p>Arnold Morse</p>	<p>Q. Was it CACI's understanding that the provisions of the Geneva Conventions pertaining to the treatment of detainees applied to its own employees at Abu Ghraib, as distinct from the military personnel at the site? A. Our people were required to file -- follow the same rules that applied to the interrogators in the military.</p> <p>Dkt. #1591 at 91-92.</p>
<p>Steve Stefanowicz</p>	<p>Q. Were there interrogation rules of engagement that set forth what could be -- what techniques and approaches could be used with detainees? A. Yes. Q. Who approved the interrogation rules of engagement? A. The Army.</p>

	Dkt. #1598 (Ex. A) at 17.
Army Interrogator C	<p>Q. And were there rules regarding the way in which you had to treat a detainee during an interrogation?</p> <p>A. Yes, there were specific rules of engagement.</p> <p>Q. And who issued those rules of engagement?</p> <p>A. The Department of Defense as far as I know.</p> <p>Dkt. #1598 (Ex. B) at 8.</p>
	<p>Q. Now, you mentioned enhanced techniques. What were you referring to by enhanced techniques?</p> <p>A. The one, specifically if they require CG approval.</p> <p>Q. And what does CG mean?</p> <p>A. Commanding general.</p> <p>Dkt. #1598 (Ex. B) at 9.</p>
	<p>Charles Mudd</p> <p>Q And when the -- and then when they were sent to their different sites, did their -- was there then additional on-site training?</p> <p>A It depends on what their job was going to be. But, yes. If they went to the prison, they got briefed by the people at the prison; if they went to a LEP screening sale, they got briefed on what their job was going to be. So they would get briefings once they went to a location what their function is going to be.</p> <p>Q And were those briefings done by the military or done by CACI personnel or both?</p> <p>A In most cases, done by military.</p> <p>4/18/24 Trial Tr. at 106:11-22.</p> <p>Q And I take it CACI continued to provide employees to the military to conduct interrogations in accord with those Rules of Engagement?</p> <p>A We continued to provide employees to the government under a task order, and, in turn, the government would drive -- dictated what Rules of Engagement should be</p>

	<p>followed.</p> <p>4/18/24 Trial Tr. at 109:23-110:4.</p>
<p>CACI Interrogator G</p>	<p>Q. CACI Interrogator G, during the time that you served at Abu Ghraib Prison as an interrogator, were there rules regarding the types of interrogation approaches that you could use?</p> <p>A. Yes.</p> <p>Q. Who promulgated the rules regarding what interrogation approaches could be used at Abu Ghraib Prison?</p> <p>A. The U.S. military.</p> <p>Dkt. #1598 (Ex. C) at 23.</p> <p>Q. From whom did you receive instructions on the Geneva Conventions?</p> <p>A. The U.S. military.</p> <p>Q. Any training from CACI on the Geneva Conventions?</p> <p>A. No. The training was done by the U.S. military.</p> <p>Dkt. #1598 (Ex. C) at 30.</p>
<p>Col. Pappas</p>	<p>Q. (BY MS. ROBINSON) Colonel Pappas, do you recall that in approximately October 2003, Lieutenant General Sanchez issued a memo governing interrogation approaches?</p> <p>A. Yes, ma'am.</p> <p>...</p> <p>Q. And this Memorandum is directed to you and others within the Military Intelligence Brigade and combined Joint Task Force 7; is that right?</p> <p>A. Yes, ma'am.</p> <p>Dkt. #1600 (Ex. B) at 31-32.</p>
<p>Scott Northrup</p>	<p>Q. Were CACI interrogators required to hold security clearances?</p> <p>A. Yes.</p> <p>Q. And who imposed that requirement?</p> <p>A. The government.</p>

	<p>Q. And do you know who approved the security clearances for the CACI employees? A. The government.</p> <p>4/19/24 Trial Tr. at 19:18-25.</p> <p>Q. So was there -- do you know who had established the rules of engagement? A. The military. Q. And that would be for the -- for interrogators? A. Correct.</p> <p>4/19/24 Trial Tr. at 20:5-9.</p>
<p>Daniel Porvaznik</p>	<p>Q. Who established the interrogation rules of engagement? A. In general, the U.S. Army. Yes, the military.</p> <p>4/19/24 Trial Tr. at 90:13-14.</p>
<p>CACI Interrogator A</p>	<p>Q. Who decided which interrogation techniques were approved for use for each and every interrogation? THE WITNESS: The Army.</p> <p>Dkt. #1600 (Ex. C) at 13.</p>
<p>Capt. Wood (Holmes)</p>	<p>Q. Okay. Did you provide any materials to the CACI interrogators as part of indoctrination? A. Materials such as? Q. Any standard operation or standard operating procedures, any rules, counseling statement. A. Yes. The -- all personnel -- I don't know when -- I don't remember when the SOP -- we had a standing SOP. They were -- everyone was familiarized with it, and eventually, we developed a memorandum of understanding that every personnel who worked at the facility read, signed, printed their name, and dated it, that they understood the -- the standing operating procedures and the rules and policies. Q. Were these documents any different for CACI interrogators than they were for military intelligence? A. No.</p> <p>Dkt. #1600 (Ex. E) at 8-9.</p>

Q. Who set the collection priorities for the interrogation teams?

A. The interrogation priorities were set by the -- by the priority intelligence requirements, and the intelligence requirements were issued by the C2, which is the senior intelligence officer or section within there, so those intelligence requirements are -- are established higher than us, and so that's who established them, I guess.

And they were published theater wide. It wasn't specifically for just interrogations. It's the overall gaps across theater.

Dkt. #1600 (Ex. E) at 9.

The U.S. Army required, reviewed, and approved interrogation plans and interrogation reports, which were contained on classified U.S. Army servers.	
Torin Nelson	<p>Q. And that interrogation could not go forward until the Army approved the interrogation plan?</p> <p>A. That's correct.</p> <p>4/15/24 PM Trial Tr. at 108:11-13.</p>
Steve Stefanowicz	<p>Q. Prior to conducting an interrogation, were -- were written interrogation plans required?</p> <p>A. Yes.</p> <p>Q. Who required the interrogation plans?</p> <p>A. It was Army protocol.</p> <p>Q. And did they have to be approved before the interrogation?</p> <p>A. Yes.</p> <p>Q. Who approved interrogation plans?</p> <p>A. They went up through the chain of command to a legal -- an Army legal officer, and the -- Colonel Pappas, while he was there. And I don't remember who his replacement was after that.</p> <p>Q. After an interrogation, did the Army require a report of the interrogation be prepared?</p> <p>A. Yes.</p> <p>Q. Who prepared the reports?</p> <p>A. The -- there was an analyst sitting in with the interrogation team. An analyst generated their reports. Those were Army analysts.</p> <p>And the interrogator, myself as -- even as a cochair or from my position, we all had to write a post-operation report.</p> <p>Q. Where did those interrogation reports get uploaded?</p> <p>A. They were uploaded to the Army's servers.</p> <p>Dkt. #1598 (Ex. A) at 17-18.</p>

	<p>Q. Can you give some examples of conditions of confinement that were implemented because you or your Tiger Team had requested it?</p> <p>A. The -- one of the scenarios was a sleep management plan and the playing of music during that sleep management plan.</p> <p>Q. And would a sleep management plan have to be approved by the Army chain of command?</p> <p>A. Absolutely. Yes.</p> <p>Q. And were there times where you sought and received authority from the chain of command to implement a sleep management plan for a detainee?</p> <p>A. Yes</p> <p>Dkt. #1598 (Ex. A) at 22.</p>
	<p>Q. Was it your understanding that the chain of command was aware of the approved conditions?</p> <p>A. The Army chain of command is the one who approved the interrogation plan, so yes.</p> <p>Dkt. #1598 (Ex. A) at 23.</p>
	<p>Q. Is this a document that was available to the Army chain of command through the interrogation server?</p> <p>A. Yes.</p> <p>Q. And do you know if interrogation reports were reviewed by the chain of command?</p> <p>A. Yes.</p> <p>Dkt. #1598 (Ex. A) at 27.</p>
<p>Army Interrogator C</p>	<p>Q. And what was the ICE or Interrogation Control Element?</p> <p>A. If I'm remembering correctly, that was the name of kind of the operational management team for the interrogation center there. They're the ones that like I guess approved interrogation plans and</p>

	<p>they kind of guided collections, if that's correct. One thing, it's been a very long time.</p> <p>Dkt. #1598 (Ex. B) at 5.</p> <p>Q. And what did you do to prepare for an interrogation? A. We had a formal procedure. Part of it was sitting down with the analysts, looking at other factors and determining what sort of approach we wanted to take when speaking to the detainee, and also a plan of what sort of information we were looking to gather during the interrogation. After that plan was -- we came up with a plan, then we gave that to our team leader who approved that plan, and then further went to a psychologist that looked at the plan and approved it, and I believe the ICE overall had to approve the final before we interrogated each day.</p> <p>Dkt. #1598 (Ex. B) at 8.</p>
<p>CACI Interrogator G</p>	<p>Q. Who approved the interrogation plans for the interrogations you conducted? THE WITNESS: Military personnel.</p> <p>Dkt. #1598 (Ex. C) at 25.</p> <p>Q. When you prepared an interrogation plan, who was the first person you provided that plan to in the approval process? THE WITNESS: The military team lead. BY MR. O'CONNOR: Q. And this might be a dumb question. Was the military team lead for you always a soldier? A. Yes.</p> <p>Dkt. #1598 (Ex. C) at 25.</p>
<p>Army Interrogator E</p>	<p>Q. Who had to approve the interrogation plan before the interrogation could go forward? A. I believe it was Colonel Jordan.</p> <p>Dkt. #1600 (Ex. A) at 5.</p>

<p>Daniel Porvaznik</p>	<p>Q. Did interrogation plans have to be approved before an interrogation could take place at Abu Ghraib? A. Interrogation plans did have to be approved. Q. And who had to approve the interrogation plans? A. Again, that would be the interrogation control element, Captain Wood and her staff. Q. Was anyone at CACI involved in approving interrogation plans? A. No. Q. Did a CACI interrogator ever show you his or her proposed interrogation plan? A. Yes. Q. Was that so that you could approve it? A. Not that I could approve it, no. Q. And why were you -- why did you sometimes see CACI interrogators propose interrogation plans? A. Well, because my background and experience, sometimes they wanted to bounce ideas. But it was like peers, like, for instance, lawyers talking to each other or doctors talking to each other. But I could not approve the plan as far as to say, go ahead.</p> <p>4/19/24 Trial Tr. at 88:3-23.</p>
<p>CACI Interrogator A</p>	<p>Q. Did your Army section leader review your interrogation plans before you were permitted to the interrogation? A. Yes.</p> <p>Dkt. #1600 (Ex. C) at 11-12.</p> <p>Q. How would you know that your 65:18 interrogation plan had been approved? 65:19 A. Section sergeant will let me or Captain 65:20 Wood will let me know.</p> <p>Dkt. #1600 (Ex. C) at 12.</p>
<p>Capt. Wood (Holmes)</p>	<p>Q. Were there any differences in the interrogation plan process for CACI personnel versus military intelligence? A. Absolutely not. Q. What was involved in an interrogation plan?</p>

A. It was a standard form that we had, and it's -- it's based off of the field manual. Gives a general idea of a -- of an interrogation plan. And so we basically replicated that on an Excel spreadsheet that the soldiers could either type up or fill out. So it was a standard form that everybody filled out.

Q. Who did the interrogation plans get submitted to?

A. Either myself, the NCOIC, the operations officer, which was a major, or my -- my CW2.

Q. Okay. If a CACI interrogator filled out an interrogation plan, did it ever get sent to someone else?

A. No, same -- same personnel.

Q. Were CACI interrogators allowed to use any different techniques or strategies than military intelligence?

A. No, ma'am.

Q. Who approved or disapproved nonstandard interrogation techniques?

A. The nonstandard interrogation techniques, it depended on the technique that was proposed. It could either be myself, Colonel Pappas, or General --

Q. Sanchez?

A. Sanchez, on the tip of my tongue.

Dkt. #1600 (Ex. E) at 9-10.

The U.S. Army determined what should be done with intelligence collected from interrogations.	
Col. Pappas	<p>Q. So from that, is it fair to say that the military decided what use to make of the information during interrogations?</p> <p>A. Yes, yes.</p> <p>Dkt. #1600 (Ex. B) at 21.</p>

The U.S. Army chain of command supervised and directed all aspects of the interrogation mission and treated Army and CACI interrogators identically.	
Torin Nelson	<p>Q. And if you had operational issues at Abu Ghraib prison, you knew you were supposed to take those through the military chain of command. Correct?</p> <p>A. If it involved interrogations, yes.</p> <p>4/15/24 PM Trial Tr. at 106:1-4.</p>
Amy Jensen Monahan	<p>Q. Now, who supervises the CACI employees in Iraq?</p> <p>A. The military.</p> <p>Dkt. #1591 at 6.</p>
Steve Stefanowicz	<p>Q. As an interrogator, who supervised you for operational matters?</p> <p>A. Sergeant Eckroth.</p> <p>Q. And was there supervisory authority above Sergeant Eckroth?</p> <p>A. Correct.</p> <p>Q. What was that?</p> <p>A. Excuse me.</p> <p>There were two Army staff sergeants. They were E-6s. I don't recall their names. They had been there for a while. From there, they reported directly into the ICE.</p> <p>At the time, after Captain Wood departed, then you had Warrant Officer John Graham. After Chief Rivas departed, John Graham and his group -- due to the Army rotations of troops in and out of the prison, John Graham, I believe, with the 202nd Military Battalion, his staff -- their staff were starting to migrate in. So there was always a chain of -- Army chain of command that we reported to.</p> <p>Dkt. #1598 (Ex. A) at 16.</p>
Mark Billings	<p>Q And were the interrogators integrated into the Army</p>

	<p>chain of command? A Absolutely. They took all instructions from the Army. Q Who decided where in Iraq the CACI personnel would be deployed once they got there? A The Army decided where they would be assigned. We were at multiple locations.</p> <p>4/18/24 Trial Tr. at 24:17-23.</p> <p>Q And the statements of work in which CACI provided interrogation personnel, the idea was that you were providing bodies but not a supervisory structure for the mission? A That's correct. Q And who was going to provide that structure under the -- A The United States Army.</p> <p>4/18/24 Trial Tr. at 68:7-14.</p>
Charles Mudd	<p>Q When you were first asked by Colonel Brady about interrogators, did that strike you as something the company could do? A Yes. Again, it's interrogators, intel-type, logistics-type. You hire persons qualified to do the job. As a company, we did not manage interrogators. I'm not an intel-type. Q You have no intelligence-gathering background? A Prior to this, prior to getting this contract, no. So if they asked me to manage intel types, I couldn't do it. I had military experience, but not intel-type. It was not my background. Q But that wasn't a reason to tell Colonel Brady that the company as a whole couldn't do it? A Oh, yeah. Issues come up. We were giving them qualified individuals, and they were managing those qualified individuals. I was not managing or my team leaders were not managing their day-to-day operations.</p> <p>4/18/24 Trial Tr. at 95:9-96:1.</p>
CACI Interrogator G	<p>Q. Who dictated or supervised how you performed the operational mission?</p>

	<p>THE WITNESS: U.S. military personnel.</p> <p>Dkt. #1598 (Ex. C) at 26.</p>
Col. Brady	<p>Q -- within a military environment with soldiers and with contractors, in your mind, what are the -- what are the similarities, and what are the differences?</p> <p>A They are a member of our team.</p> <p>Q And what do you mean by saying a member of the team? They have the same responsibilities as a military person?</p> <p>A What I'm saying is that they are part of our mission. They're part of how we execute our mission.</p> <p>Q Are there any differences between a soldier and a contract employee?</p> <p>A In my opinion, there are some differences, primarily administrative and logistical. But from a mission's standpoint, no.</p> <p>4/18/24 Trial Tr. at 122:2-14.</p>
	<p>A I would consider the military as the overseer of the civilian contractor.</p> <p>4/18/24 Trial Tr. at 122:21-22.</p>
	<p>A In my experience when there is a contractor embedded in a unit, whether it is a staff or whatever the function is -- and I'm being generic here in my experience -- that that contractor has clearly worked for the supervisor of that particular section or unit.</p> <p>4/18/24 Trial Tr. at 123:14-18.</p>
	<p>Q And so did you have some pattern or practice where you talked to your leadership point of contact how are the CACI employees doing?</p> <p>A I can't say that I had a set rhythm or such to do that. I guess what I will express is that I was very confident in the military chain of command. It does real well for the Army. The contract employees were embedded with the military chain of command. Any problem, regardless of the nature of the problem, the Army's pretty good at reporting the problem.</p>

	4/18/24 Trial Tr. at 127:15-24.
Army Interrogator E	<p>Q. How would you learn that you had been assigned to work with a particular interrogator?</p> <p>A. Told by a supervisor.</p> <p>Q. And who was your supervisor?</p> <p>A. I don't recall the name.</p> <p>Q. Was it a soldier?</p> <p>A. Yes.</p> <p>Q. How would you learn that a detainee had been assigned to your Tiger Team for interrogation?</p> <p>A. Supervisor would give us a file, dossier.</p> <p>Q. And again, the supervisor would be a soldier?</p> <p>A. Yes.</p> <p>Dkt. #1600 (Ex. A) at 4-5.</p>
Col. Pappas	<p>Q. (BY MS. BAILEY) Well, let me ask, what do you view as operational control.</p> <p>A. Well, so -- because -- the reason I ask that question is because the -- the contract itself was under, you know -- the -- CACI was contracted to do specific tasks but was overseen by a contracting officer representative, and -- and I don't recall whether it was -- but it was normally overseen by a program manager, usually from the corporation or company providing the -- the service.</p> <p>The -- but in terms of operational control, if you mean that -- like, did they have to follow the interrogation rules set out by the 205th Brigade? The answer to that question is yes.</p> <p>Q. Okay. So in their duties as interrogators, who directed their actions?</p> <p>A. So there were a number of people. You know, it's like -- it was a military organization. So there was a -- a chain of supervision. There was probably an NCOIC equivalent. There was an OIC equivalent -- or I believe it was a Captain. There was a Major, I believe, Operations Officer. There was myself. At one point we had a Deputy Operations Officer, so -- so there was a chain of supervision.</p>

	<p>Dkt. #1600 (Ex. B) at 9-10.</p> <p>Q. Can you tell if they were in a leadership position over the team?</p> <p>A. No. The leadership positions would have been to the left of that, where you see the -- the categorization.</p> <p>Q. Yes, Your Honor -- or excuse me. Yes, sir, that's what I am asking.</p> <p>If -- under the names in the categorizations, are those the individuals that were the team leaders?</p> <p>A. Yes. That's what that would have reflected.</p> <p>Q. Okay. And are those all of those individuals military members?</p> <p>A. Yes.</p> <p>Dkt. #1600 (Ex. B) at 16.</p>
	<p>Q. (BY MS. BAILEY) Colonel Pappas, were CACI interrogators at Abu Ghraib directly supervised by the military chain of command in the intel- -- in the Interrogation Center?</p> <p>A. Yes.</p> <p>Q. Okay. Did CACI interrogators receive the same operational interrogation taskings as their military counterparts?</p> <p>A. I believe so, yes.</p> <p>Q. Did they receive the same direction as their military counterparts?</p> <p>A. I believe so, yes.</p> <p>Q. Were CACI interrogators in all respects subject to the operational control of the military?</p> <p>A. Again, I have to ask, in -- in what terms? Because there were contractual --</p> <p>Q. In terms of their interrogation duties?</p> <p>A. Yes.</p> <p>Q. Were CACI interrogators subject to the same standards of conduct as the military members?</p> <p>A. Yes.</p> <p>Q. Who decided where each detainee would be</p>

	<p>incarcerated within Abu Ghraib, between the military or CACI interrogators or anyone from CACI?</p> <p>A. It was done -- I -- probably done at the -- when they first came in, in the screening, and so it would be military.</p> <p>Q. Who decided which detainees would be interrogated?</p> <p>A. That was a function of the ICE that you saw on the thing, in that it would go through an approval process.</p> <p>Q. Was it the military that decided which detainees would be interrogated?</p> <p>A. Ultimately, yes.</p> <p>Q. Who would conduct -- or excuse me. Who decided who conducted the interrogations of a given detainee?</p> <p>A. The -- the -- probably the NCOIC.</p> <p>Q. So the military?</p> <p>A. Yes.</p> <p>Q. Were all interrogators required to prepare an interrogation plan?</p> <p>A. Yes.</p> <p>Q. So that was both military and CACI?</p> <p>A. Yes.</p> <p>Q. Who reviewed the interrogation plans?</p> <p>A. It -- it went through the -- the ICE up through operations, and at some point in the December time frame, perhaps a little earlier, I reviewed -- I would review those as well.</p> <p>Q. So is it fair to say from your answer the military chain of command reviewed them?</p> <p>A. Yes.</p> <p>Dkt. #1600 (Ex. B) at 19-20.</p>
	<p>Q. You mentioned earlier that -- well, were CACI interrogators and military interrogators subject to the same standards of conduct?</p> <p>A. Yes.</p> <p>Dkt. #1600 (Ex. B) at 21.</p>
	<p>Q. I think you mentioned Lieutenant Colonel Jordan</p>

	<p>earlier, and I think you said that by the time you came to Abu Ghraib permanently in that November period, he was made the Deputy of the JIDC?</p> <p>A. Yes, ma'am.</p> <p>Q. Prior to that time, he had been in charge of the JIDC, right?</p> <p>A. Yes, ma'am.</p> <p>Q. And, at that time, you saw him as your man on the ground when it came to what was happening on a day-to-day basis at Abu Ghraib?</p> <p>A. He was the OIC, yes, ma'am, the Officer in Charge.</p> <p>Q. So he was the person ultimately responsible for making sure that military intelligence was issuing appropriate instructions in the context of their interrogations. Is that fair to say?</p> <p>A. Yes, ma'am, that's fair to say.</p> <p>Dkt. #1600 (Ex. B) at 29.</p>
Scott Northrup	<p>Q. And was there a difference in how CACI interrogators were expected to perform their mission from the way the soldiers were expected to perform?</p> <p>A. No.</p> <p>4/19/24 Trial Tr. at 20:10-13.</p>
Daniel Porvaznik	<p>Q. And I understand your testimony is that while you were working for CACI at the Abu Ghraib prison, the United States Army had command and control over CACI personnel. Is that your testimony?</p> <p>A. When it comes to in regards to the actual interrogations, report writing, plans, yes, the Army had control.</p> <p>...</p> <p>Q. And that the United States military assigned all the tasks to CACI personnel. Is that right?</p> <p>A. Correct.</p> <p>Q. And that you and all CACI interrogators reported to Captain Wood. Is that right?</p> <p>A. Yes. Not necessarily directly. There were section leaders, and then again, also, she had a couple of chief warrant officers. But ultimately, yes, Captain Wood.</p>

	<p>4/19/24 Trial Tr. at 101:18-102:10.</p> <p>Q. It's your testimony that you had no ability to assign CACI interrogators to conduct particular interrogations. Is that right?</p> <p>A. Correct. That was solely in the -- under the purview of the U.S. Army. I had no control over whether they --</p> <p>Q. Did you have any input?</p> <p>A. No, I did not.</p> <p>Q. And that's because it's your testimony that CACI had no operational control whatsoever. Is that right?</p> <p>A. Correct.</p> <p>4/19/24 Trial Tr. at 107:16-25.</p>
<p>CACI Interrogator A</p>	<p>Q. Do you remember who was in charge in the Interrogation Control Element?</p> <p>Yes.</p> <p>Q. Who was that?</p> <p>THE WITNESS: Captain Wood.</p> <p>Dkt. #1600 (Ex. C) at 9.</p> <p>Q. Was the ICE in charge of interrogations conducted both by military intelligence interrogators and CACI interrogators?</p> <p>THE WITNESS: Yes.</p> <p>Dkt. #1600 (Ex. C) at 10.</p> <p>Q. Who assigned your tiger team to the detainees who you interrogated?</p> <p>A. The Army.</p> <p>Q. How did you learn that a detainee had been assigned to your tiger team?</p> <p>THE WITNESS: From your section sergeant.</p> <p>Q. Okay. And was the section sergeant someone who was in the Army?</p> <p>A. Yes.</p> <p>Q. Who did your section leader report to with respect to interrogations at Abu Ghraib Prison?</p> <p>A. Sergeant Aston.</p>

	<p>Q. And who did he report to? A. Captain Wood.</p> <p>Dkt. #1600 (Ex. C) at 11.</p> <p>Q. In terms of approval of interrogation plans, were tiger teams having a CACI interrogator treat any different from tiger teams having an Army interrogator? THE WITNESS: No.</p> <p>Q. Did anyone other than Army personnel have a role in setting the rules for treatment of detainees at Abu Ghraib Prison? THE WITNESS: No.</p> <p>Dkt. #1600 (Ex. C) at 13.</p>
<p>Capt. Wood (Holmes)</p>	<p>Q. Okay. So just to clarify, who would have been on a team, an interrogation team? A. No two teams were really alike.</p> <p>Q. Okay. A. Because the -- the manning was -- was so diversified with the different skill sets, the different experience levels, the different people coming from different areas, different units, different locations, we did not really go by a set, you must have A and B and C per team.</p> <p>We matched up the best -- the best possible two personnel to complement each other, both in either experience or -- or skill sets.</p> <p>Q. Okay. When you say, "we matched up," who made the decision on who was a team? A. It was myself, my chief warrant officer, and my NCOIC, and so we collectively kind of moved people around as necessary.</p> <p>Q. Okay. And who was your chief warrant officer? A. My chief warrant officer is a CW2 at the time, he's since been promoted, John Graham.</p> <p>Q. Okay. And who is your NCOIC? A. My NCOIC was Sergeant First Class Kevin Johnson.</p>

Dkt. #1600 (Ex. E) at 5-6.

What did you do with the CACI personnel when they showed up? What, you know -- they arrived, what happens next?

A. Basically, we treated the CACI personnel the same way that we did the military intelligence. They were welcomed. We made sure they had proper billets. We made sure they were properly equipped, that they had the -- meaning they had the proper protective equipment. They, of course, were not armed at all.

We -- once they were settled and we made sure that they had everything that they needed, we would orient them to base camp and find out what their background was. I worked with -- there was a CACI kind of senior administrator, worked with him to place the personnel because the different personnel -- some of the personnel had different skill sets.

Some of them were not interrogators. They were -- not actually -- I don't think any of them were interrogators. And we matched them up with the military personnel as to put them on teams or on screening teams, interrogation teams, administrative processing. Some of them worked in the -- well, we call it the ACE, the analysis control element, but basically, it's kind of a smaller, kind of deep-dive research team in layman's terms.

Q. Who made the decision about which CACI personnel would be placed on an interrogation team?

A. It was the -- again, myself, Mr. -- Mr. Graham, Sergeant Johnson and then -- I believe his name was Dan Porvaznik, who was the CACI guy, the senior guy who showed up after -- after a little while.

Q. Okay. In terms of the final decision, who -- would you have had authority to approve or disapprove someone being on a team?

A. Would I have?

THE WITNESS: Yes.

Dkt. #1600 (Ex. E) at 7-8.

Q. With respect to interrogation operations, who

	<p>did CACI interrogators report to?</p> <p>A. They would have reported to their section -- section sergeant and then also to Sergeant Johnson, Chief Graham, and myself. Major -- Major Price, I believe he was the operational sergeant. So they fell under the same chain of command, if you will.</p> <p>Q. Were there any differences in their chain of command?</p> <p>A. I don't know on the CACI side, but as far as the day-to-day operations that had to do with -- with the mission, no, there was no difference.</p> <p>Q. Okay. Did CACI personnel have any -- or interrogators specifically have any different performance requirements than military intelligence?</p> <p>A. No.</p> <p>Dkt. #1600 (Ex. E) at 9.</p>
	<p>Q. Did you ever monitor interrogations where there was a CACI interrogator?</p> <p>A. I can't say for sure. I treated them all the same, so it really wouldn't have stood out to me whether they were an intel or -- or a CACI guy.</p> <p>Dkt. #1600 (Ex. E) at 11.</p>
	<p>Q. When you briefed it, did you also brief the 126:20 policy changes to the CACI interrogators?</p> <p>126:21 A. Yes, we briefed them all together. I treated 126:22 them all the same, so when I talked to the soldiers, I 126:23 also talked to the CACI. I didn't differentiate between 126:24 the civilian and the soldiers because I treated them all 126:25 exactly the same.</p> <p>Dkt. #1600 (Ex. E) at 12.</p>

The U.S. Army had to and did approve the hiring, promotion, or transferring of interrogators and could and did require that CACI remove CACI interrogators from the contract.	
Torin Nelson	<p>Q. And you talked about your experience of interrogation personnel at Abu Ghraib prison. It was the Army that set the criteria for civilian interrogators. Correct?</p> <p>A. Yes.</p> <p>Q. And you know that some CACI personnel were promoted by the Army once they were at Abu Ghraib, so they would be moved from, for instance, screener to interrogator?</p> <p>A. Agreed to.</p> <p>Q. The Army approved any promotion --</p> <p>A. It wasn't their own opinion. It was recommendations and then they agreed to it, sure.</p> <p>Q. And the Army agreed to it?</p> <p>A. Yes.</p> <p>4/15/24 PM Trial Tr. at 116:22-117:9.</p>
Amy Jensen Monahan	<p>Q. And did CACI alert the COR that it was sending over [resumes] that did not match the statement of work?</p> <p>A. Yes.</p> <p>Dkt. #1601-2 at 2.</p>
Arnold Morse	<p>Q. In fact, was Mr. Stefanowicz qualified for the interrogator position at the time he was hired at CACI to participate in the Abu Ghraib project?</p> <p>A. At the time he was hired, the government customer indicated his approval for putting him in the position we placed him in.</p> <p>Q. And that was the position of screener, not interrogator, correct?</p> <p>A. I believe that's correct.</p> <p>Dkt. #1591 at 90-91.</p>
Steve Stefanowicz	<p>Q. Was the decision made to shift you from screening duties to interrogator duties?</p> <p>A. Correct. Yes.</p> <p>Q. Who made that decision?</p> <p>A. The Army did, Captain Wood.</p>

	<p>Dkt. #1598 (Ex. A) at 9-10.</p> <p>Q. When Mr. Porvaznik stopped acting as site lead, was someone named to replace him as site lead?</p> <p>A. I was. I was identified.</p> <p>Q. Do you know if the Army approved you acting as site lead?</p> <p>A. Yes.</p> <p>Dkt. #1598 (Ex. A) at 19.</p> <p>Q. You were interrogating detainees even when your title was screener?</p> <p>A. No.</p> <p>The Army had approved me to switch out a screening role to the interrogator role. And when the logistics of the paperwork were -- of CACI internally were finalized was different than what was preapproved by the Army's chain of command.</p> <p>Q. Okay. So the Army approved this before it showed -- approved your promotion before it showed up in CACI's paperwork?</p> <p>A. They approved the lateral movement of my job. That is correct.</p> <p>Dkt. #1598 (Ex. A) at 51-52.</p>
<p>Mark Billings</p>	<p>Q Did the government have the power to direct CACI to remove an employee from a contract?</p> <p>A Yes, they did.</p> <p>Q And did the government ever exercise that power?</p> <p>A Yes, they did.</p> <p>4/18/24 Trial Tr. at 27:9-13.</p> <p>Q And ultimately did the government receive CACI's rebuttal and say take him off the contract anyways?</p> <p>A Yes.</p> <p>Q And what did CACI do?</p> <p>A We took him off the contract.</p> <p>Q Were there other employees who were on the contract</p>

	<p>that the government directed CACI to take off the contract? A Yes. Q Do you remember an employee named Joe Ryan? A I do. Q Did the government ask that he be removed from the contract? A They did. Q And do you recall what he did? A Well, he said things that were not very flattering about the United States military and in a home-log-type thing. So he was sending nice little emails or whatever back to the hometown to publish stuff. Q Like a local newspaper? A Yes. Q And when the government said take Ryan off the contract, what did CACI do? A Took him off the contract.</p> <p>4/18/24 Trial Tr. at 29:10-30:7.</p>
	<p>Q Were CACI employees sometimes promoted from, say, screener or analysts to interrogator? A Yes, they were. Q And whose decision was that? A That was the government, the Army's decision.</p> <p>4/18/24 Trial Tr. at 30:8-12.</p>
	<p>Q So was it your understanding that the Army approved everyone who was hired to work as a -- A Absolutely. Q And did the Army approve everyone who CACI hired at all to send to Abu Ghraib? A Yes. They reviewed all resumes. Q All right. They read all resumes? A They reviewed all resumes that were submitted for hiring. Q All right. Let's -- A Let me clarify. That was one of the responsibilities of the COR that you brought up before. Q And what is the COR? A Contracting officer representative.</p>

	<p>4/18/24 Trial Tr. at 43:15-44:3.</p> <p>Q But isn't it true that many of the resumes that received a sign-off were signed off by Tom Howard, who was a CACI employee, not by the military?</p> <p>A I know nothing about that.</p> <p>Q All right. Let's return to --</p> <p>A You must understand that Tom was a senior person at that time with the company. He reviewed things, but it was still the COR's responsibility to accept that individual. It was not Tom's decision whether or not we hired someone.</p> <p>Q Okay. So Tom did not have approval authority, did not sign off on resumes for hires, he didn't give approval?</p> <p>A He does not have -- he did not have that authority; it was a government approval that was required.</p> <p>4/18/24 Trial Tr. at 48:19-49:6.</p> <p>Q So Mr. Howard, did he express concern that Tim Dugan's resume would not be appropriate for an interrogator position?</p> <p>A I can't recall.</p> <p>Q Okay. But, in any event, he was hired as a screener?</p> <p>A Correct.</p> <p>Q And who made the decision to promote him to an interrogator?</p> <p>A The United States Army.</p> <p>4/18/24 Trial Tr. at 69:21-70:4.</p>
<p>Charles Mudd</p>	<p>A For the non-intel-type, I understand what it means. We had a few who, based upon how good a job they did as a screener and the government's recommendation, we would promote them up to being an interrogator, and we had other ones who were not promoted based upon the government's recommendation.</p> <p>Q And when you say "government's recommendation," how did that come about? Did they simply come to you -- did Captain Wood or someone else come to you and say they want Big Steve to be promoted to interrogator?</p> <p>A Uh-huh.</p>

	<p>4/18/24 Trial Tr. at 98:21-99:6.</p> <p>Q Now, when you -- when CACI wanted to make a rehab transfer, what did it have to do?</p> <p>A We would go to our COR and say we've got A, B, C, we've got Mr. So and So and -- or Ms. So and So at this location, he or she is not doing this properly, we think by moving them over to this other location, we think there's a personality conflict, or we think if we move this individual they'll still do a good job, then the COR would have to bless it, approve it.</p> <p>4/18/24 Trial Tr. at 104:6-14.</p>
<p>Col. Brady</p>	<p>A Is it an audience? The leadership of the MI brigade that they knew they had the ability to reject unsatisfactory soldiers, unsatisfactory contractors, any unsatisfactory condition on the ground because that's the scope of a commander on the ground.</p> <p>4/18/24 Trial Tr. at 127:8-12.</p>
<p>Scott Northrup</p>	<p>Q. All right. What if any on-boarding or training did you go through before arriving in Iraq?</p> <p>A. Okay. So after I was offered the position by CACI, they then -- Chuck Mudd had my résumé reviewed by the COR to determine whether he felt I was a good fit. And he agreed I was.</p> <p>4/19/24 Trial Tr. at 10:21-11:1.</p> <p>Q. Okay. And you said, if I understood you correctly, that your résumé was reviewed by the COR?</p> <p>A. Correct.</p> <p>Q. Now, the COR is -- what is the COR?</p> <p>A. The COR is the contracting officer's representative.</p> <p>Q. Before you explain, is that a military position or is that a civilian position?</p> <p>A. Oh, well, it depends on the contract.</p> <p>Q. Under the contract that CACI had.</p> <p>A. Under this contract it was a military position. When I first arrived in Iraq, it was Lieutenant Colonel Brady, and then in February of '04 -- Colonel Brady was with 5th Corps. In February '04, 5th Corps left country and 3rd Corps arrived, and</p>

	<p>the new corps was Major Daniels.</p> <p>4/19/24 Trial Tr. at 11:15-12:3.</p>
	<p>Q. Who determined if CACI screeners got promoted from screener position to the position of interrogator?</p> <p>A. All positions, those included, for any type of operational promotion was recommended and requested by the military, and would be approved by the COR before it could happen.</p> <p>Q. Okay. And did CACI have some involvement in that decision?</p> <p>A. Not in the decision itself. Our role would have been if a person was promoted, it would mean moving up in the labor category level. And so then it would become a contractual thing so that we were invoicing properly and billing properly.</p> <p>Q. All right. And how was that promotion communicated from Iraq back to Chantilly?</p> <p>A. After I was in country, it would be through me. Previous to that, I'm not totally sure. I think probably via email.</p> <p>Q. Now, do you know whether the military had to approve all the CACI personnel prior to their deployment to Iraq?</p> <p>A. Yes. They would review the résumés of personnel, and sometimes that would occur via direct email to the COR and other times it would be me sitting with the COR going through résumés.</p> <p>Q. Okay. So once you arrived in Iraq, did you have direct discussions with the COR about individuals who CACI proposed to be hired under the contract?</p> <p>A. Yes.</p> <p>Q. And who approved your hiring, do you know?</p> <p>A. Colonel Brady.</p> <p>4/19/24 Trial Tr. at 18:4-19:3.</p>
	<p>Q. Okay. Could the Army fire a CACI employee?</p> <p>A. The Army could request an employee be removed from the contract.</p> <p>Q. Okay. So could the Army impose any discipline on a CACI employee?</p> <p>A. Discipline in the sense of requesting they be removed from the contract or perhaps removed from the base that they were on. But that kind of discipline. I guess I'm not sure what parameter of discipline you mean.</p> <p>Q. Yeah, is that something that the Army could do, request that</p>

	<p>somebody be removed from the contract?</p> <p>A. Correct.</p> <p>Q. And could they request that they be removed from one facility in particular and maybe put at a different facility?</p> <p>A. Yes.</p> <p>Q. And could they request that a security clearance be removed?</p> <p>A. Yes. Yeah, that was also --</p> <p>Q. And what would happen if a request like that was made?</p> <p>A. We would accommodate to the best of our ability. We were there at the behest of the government.</p> <p>4/19/24 Trial Tr. at 22:21-23:15.</p>
	<p>Q. And if the interrogators didn't have the equivalent experience to what was called for under the contract, their hiring was nevertheless approved by the Army?</p> <p>A. Well, it would depend. Sometimes the COR would allow it and other times they would not.</p> <p>Q. But if an interrogator or a screener didn't have the minimum requirements and they were allowed to work, it would be because the Army approved their working under the contract?</p> <p>A. Correct.</p> <p>4/19/24 Trial Tr. at 29:17-25.</p>
	<p>A. It's a memorandum for record from Major Daniels, the COR, to me, regarding Dan Johnson, requesting termination and security clearance revocation.</p> <p>Q. So is this an example of what you were describing before of how the Army could request that somebody be removed from a contract --</p> <p>A. Correct.</p> <p>Q. -- or terminated in some way? And would these categories, requests for termination and pending security clearance revocation for Dan Johnson, those would be the kind of, I'm using the word "discipline," that the Army could request being imposed?</p> <p>A. Correct.</p> <p>4/19/24 Trial Tr. at 36:13-25.</p>
	<p>A. From a CACI administrative perspective, for our purposes, it was us. But any operational mission-related promotions would be</p>

	<p>requested and recommended by the local military lead through the COR, and would require the COR's concurrence.</p> <p>Q. So it's your testimony CACI could promote somebody for administrative purposes, such as to site lead at Abu Ghraib, but he could not be promoted for operational reasons --</p> <p>A. That's correct.</p> <p>Q. -- for separate operational responsibilities?</p> <p>A. Two different responsibilities.</p> <p>Q. So a site lead could be promoted for an administrative purpose but not for an operational purpose?</p> <p>A. Correct.</p> <p>4/19/24 Trial Tr. at 52:11-23.</p>
<p>Daniel Porvaznik</p>	<p>Q. Were CACI employees sometimes promoted from screener to interrogator?</p> <p>A. That did happen on a couple of occasions, yes.</p> <p>Q. Whose decision was that?</p> <p>A. That would be the client, the U.S. Army.</p> <p>4/19/24 Trial Tr. at 90:15-19.</p>
	<p>Q. And [Mr. Stefanowicz] became an interrogator with CACI only a few days after his arrival. Is that right?</p> <p>A. And that was after -- in consultation with. That's not the right verb. Captain Wood and others wanted him to become an interrogator. It was the client's request.</p> <p>Q. And a few months later, in January 2004, as you were leaving to go out on your R&R, Mr. Stefanowicz was promoted to take your position as the onsite leader. Is that right?</p> <p>A. The actual sequence of events is, ultimately he did take over as site lead. Hopefully that answers your question.</p> <p>Q. Okay. And you recommended him for that position. Is that right?</p> <p>A. I did. But also, the client much preferred that also, meaning the U.S. Army.</p> <p>4/19/24 Trial Tr. at 99:14-100:2.</p>
	<p>Q. And it's your testimony that the United States military approved all CACI personnel prior to their deployment to Iraq. Is that right?</p>

	<p>A. That is my understanding, correct. Yes.</p> <p>4/19/24 Trial Tr. at 101:24-102:2.</p>
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CACI personnel had no role in the intelligence chain of command.	
Torin Nelson	<p>Q. Didn't you testify, "Not that CACI -- we knew that CACI couldn't do anything, really, about operational affairs, intelligence matters, anything like that, but at least that they should be aware of the fact that some of the CACI personnel were dealing, through the military chain of command, with intelligence matters or operational matters." A. Yes.</p> <p>4/15/24 PM Trial Tr. at 107:1-7.</p> <p>Q. You didn't understand anyone stateside or in CACI's home office to have any concern with the operational matters at Abu Ghraib prison. Right? A. That's correct.</p> <p>4/15/24 PM Trial Tr. at 107:23-108:1.</p>
Steve Stefanowicz	<p>Q. Was anyone from CACI in your operational chain of command? A. No.</p> <p>Dkt. #1598 (Ex. A) at 17.</p>
CACI Interrogator G	<p>Q. Did CACI PT personnel have a role in the approval process for your interrogation plans? A. Not that I recall, no.</p> <p>Q. Did CACI personnel have any role in dictating the conditions of confinement for any detainee who was assigned to you for an interrogation? A. No.</p> <p>Q. Did CACI personnel have any role in deciding how detainees assigned to you were treated while in U.S. custody? A. No.</p> <p>Q. Did CACI personnel have any role in selecting the interrogation approaches or techniques that you used in your interrogations? A. No.</p> <p>Q. Did CACI personnel have any role in supervising or dictating how you performed the</p>

	<p>operational mission? A. No.</p> <p>Dkt. #1598 (Ex. C) at 25-26.</p>
<p>Army Interrogator F</p>	<p>Did CACI personnel have any role in assigning a detainee to you and Interrogator C for an interrogation? A. No.</p> <p>Q. Did CACI personnel have any role in dictating the conditions of confinement for any detainee who was assigned to you and Interrogator C for interrogation? A. Not to my knowledge.</p> <p>Q. Did CACI personnel have any role in deciding how detainees assigned to you and Interrogator C were treated while in U.S. custody? A. No, I don't think so.</p> <p>Q. Did CACI personnel have any role in selecting the interrogation approaches or techniques that you and Interrogator C used in your interrogations? A. Not that I know of.</p> <p>Q. Did CACI personnel have any role in deciding how you and Interrogator C conducted yourselves during an interrogation? A. No.</p> <p>Dkt. #1598 (Ex. E) at 13.</p>
<p>Interpreter M</p>	<p>Q. Did CACI employees have any role in assigning you to an interrogation? A. No. You know, what I never heard about this name while I'm there.</p> <p>Q. Okay. Did any civilian contractors, including CACI, have any role in dictating how detainees that you were translating interrogations for were supposed to be treated? A. No.</p> <p>Did any civilian contractor personnel have any role that you know of in deciding what interrogation techniques could and could not be used on detainees</p>

	<p>during interrogations that you translated? A. No. That was not our job, actually. Our job was just to translate. Q. Okay. And everything you translated were interrogations conducted solely by Army personnel; is 49:16 that right? A. Yes. Q. And are you aware of CACI personnel or any civilian contractor personnel having any role in dictating how the Army interrogation personnel conducted interrogations? A. You know, I never heard about this name CIC. During my stay there, I never heard about this name. Q. So is it fair to say that you're not aware of CACI personnel having any role in the interrogations that you translated? A. Exactly.</p> <p>Dkt. #1598 (Ex. G) at 6.</p> <p>Q. My question is for the interrogations that you translated, are you aware of any other civilian contractor who was helping the interrogation team with the interrogation? A. No.</p> <p>Dkt. #1598 (Ex. G) at 8.</p>
<p>Interpreter N</p>	<p>I believe you testified that most of the interrogations you translated had an Army interrogator; is that right? A. Yes. Q. Are you aware of civilian interrogators having any role in how those interrogations proceeded? A. No, I don't.</p> <p>Dkt. #1598 (Ex. H) at 8.</p>
<p>CACI Interrogator A</p>	<p>Q. Did anyone at CACI have authority to approve your interrogation plans? A. No.</p>

	Dkt. #1600 (Ex. C) at 13.
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CACI's supervision of its interrogators was limited to administrative matters and it had no duty or ability to supervise interrogation operations.	
Torin Nelson	<p>Q. Mr. Nelson, you testified that you flew over to Iraq with Scott Northrop. Right?</p> <p>A. Correct.</p> <p>Q. And he was a CACI country manager?</p> <p>A. Yes. He was the incoming one. I don't know who was country manager before him.</p> <p>Q. And that made him the senior CACI employee for administrative matters. Right?</p> <p>A. As far as I know, yes.</p> <p>4/15/24 PM Trial Tr. at 105:14-22.</p>
Amy Jensen Monahan	<p>Q. Did most of the -- did most of the discussion about personnel focus on people that were having difficulties performing?</p> <p>A. Most of the discussion regarding personnel at that point in time focused on pay and benefits and leave.</p> <p>Q. Getting people paid and making sure they had time off?</p> <p>A. Correct.</p> <p>Dkt. #1591 at 7.</p>
Steve Stefanowicz	<p>Q. What role did CACI personnel have in supervising interrogation operations?</p> <p>A. None.</p> <p>Q. Were interrogation plans run by CACI personnel for approval?</p> <p>A. No.</p> <p>Dkt. #1598 (Ex. A) at 18.</p> <p>Q. Now, did CACI have someone at Abu Ghraib who was designated as the site lead?</p> <p>A. Yes.</p> <p>Q. Who was -- who was the site lead when you arrived?</p> <p>A. Dan Porvaznik.</p> <p>Q. Did the site lead have operational</p>

	<p>control over CACI interrogators? A. No. Q. Was the site lead an approval point for interrogation plans? A. No. Q. What were the site lead's responsibilities? A. CACI business operation support. So for all the staff that were coming to Abu Ghraib, their administrative pay, making sure the staff could reach out to family, their -- the ones who they had left at home, whether as -- whatever their support networks were that they wanted to communicate to, payroll issues, eventually planning for travel, vacations, scheduling, administrative support.</p> <p>Dkt. #1598 (Ex. A) at 18.</p>
	<p>Q. You were involved in deciding which interrogator should be assigned to which detainees? A. No. Q. You weren't involved in that? A. No. Q. You reviewed interrogation plans? A. No. Q. You never did that when you were site lead at CACI? A. No. Q. You attended meetings with Dan Porvaznik? A. Sometimes. Not often. Q. You discussed interrogation plans at those meetings? A. No. Q. The site lead had no role in reviewing interrogation plans. Is that your testimony? A. Absolutely.</p>

	<p>Dkt. #1598 (Ex. A) at 56-57.</p> <p>Q. Are inquiries like this -- pay problems, were those the type of administrative things that a site lead did for CACI?</p> <p>A. Correct.</p> <p>Q. As site lead, did you have any supervisory authority over how CACI interrogators did their job?</p> <p>A. No.</p> <p>Dkt. #1598 (Ex. A) at 86.</p> <p>Q. You'd mentioned a CACI country manager and that the site lead corresponded with the country manager. Did the country manager have any role in the interrogation operations at Abu Ghraib prison?</p> <p>A. No.</p> <p>Q. It an administrative position?</p> <p>A. Correct.</p> <p>Dkt. #1598 (Ex. A) at 87.</p>
<p>Mark Billings</p>	<p>Q Okay. And once the United States had invaded Iraq, did CACI obtain a contract to provide interrogators and analysts in support of the Army in Iraq?</p> <p>A Yes.</p> <p>Q Was this a staff augmentation contract?</p> <p>A Yes, it was.</p> <p>Q What types of positions did CACI fill under the contract?</p> <p>A We had analysts, screeners, interrogators. Those were, I guess, the primary ones that we provided support for.</p> <p>Q Did CACI provide a -- an operational supervision hierarchy to manage the interrogations that were being done by its interrogators?</p> <p>A No, not at all.</p> <p>Q Who provided that type of supervision for the interrogators?</p> <p>A The United States Army did.</p>

	<p>4/18/24 Trial Tr. at 23:25-24:16.</p>
<p>Charles Mudd</p>	<p>Q So you did a lot of direct conversation with the employees? A Direct conversation. Q And what was the purpose of that? A To make sure they're taken good care of, did they have any complaints that maybe we could help them with, living conditions, food, danger. A lot of it was just showing them that CACI corporate was concerned about their welfare.</p> <p>4/18/24 Trial Tr. at 102:4-11.</p> <p>Q And what were the types of things that you learned from the customer? A I would find out about personality conflicts, certain employees weren't working out properly, coming late to work, taking lunch breaks too long, were not writing good reports. Normal things like that, you know, we would hear about. Q And then when you got that information from the customer, what did you do with it? A Counsel employee if there was need to be counseled.</p> <p>4/18/24 Trial Tr. at 102:23-103:6.</p> <p>Q Did the CACI site leads do any briefings? A Yes. They did the briefings on the admin stuff. Okay. Here's how we do time sheets. This says you have to keep a daily time sheet. So they did the CACI admin-type stuff, made sure they understood their chain of command. If they had a problem with the site lead, they could jump up to the country manager, make sure they had the project manager's name and phone number, email address so they could always go back to CACI corporate if they had an issue.</p> <p>4/18/24 Trial Tr. at 106:23-107:6.</p>
<p>CACI Interrogator G</p>	<p>Q. While you were at Abu Ghraib Prison, did CACI have someone there who was designated as the site lead? A. Yes. Q. What sort of things was the site lead responsible for?</p>

	<p>A. Care and the feeding of -- or taking care of the CACI employees.</p> <p>Q. By taking care of the CACI employees, do you mean like making sure you had a place to live and a place to sleep and things like that?</p> <p>A. Correct.</p> <p>Q. Did the site lead have any operational role in how you performed the mission?</p> <p>A. No.</p> <p>Dkt. #1598 (Ex. C) at 26.</p> <p>Q. And who was your supervisor at Abu Ghraib?</p> <p>THE WITNESS: It was a military team lead.</p> <p>BY MR. NELSON:</p> <p>Q. Did you have a CACI supervisor?</p> <p>A. There was a site lead that would take care of health and welfare. I answered that earlier.</p> <p>Dkt. #1598 (Ex. C) at 29.</p>
<p>Scott Northrup</p>	<p>Q. Okay. And what was your role expected to be as in-country manager?</p> <p>A. As the in-country manager I was the primary point of contact for administrative and contractual matters for the military, primarily the COR, the contracting officer representative. And also, I supported our personnel there, our CACI personnel, if they had any type of administrative issues such as payroll problems or...I also ensured that they had proper, you know, living quarters wherever they -- whichever forward operating base they were sent to, as well as working accommodations.</p> <p>4/19/24 Trial Tr. at 9:11-20.</p> <p>A. Well, operational control was dictated by the military because that was the day-to-day mission support.</p> <p>Q. And did you have any responsibility whatsoever for that function?</p> <p>A. No.</p> <p>4/19/24 Trial Tr. at 10:16-20.</p> <p>Q. So can you describe what your role was when you actually got to Iraq? What did you do?</p>

	<p>A. Yeah. So, once again, I was the primary administrative contractual point of contact for the military, specifically the COR. And I also provided administrative support to our personnel that were there.</p> <p>4/19/24 Trial Tr. at 13:21-14:1.</p>
	<p>Q. All right. Did you exercise any operational control over CACI or military interrogators?</p> <p>A. No.</p> <p>Q. Did you supervise or direct the day-to-day job performance of CACI interrogators?</p> <p>A. No.</p> <p>Q. Who had that operational control?</p> <p>A. The military.</p> <p>Q. And as far as you understood, who was responsible for the supervision and direction of day-to-day operations of CACI interrogators?</p> <p>A. Depending on the site, there would be either a noncommissioned officer in charge, NCOIC, or commissioned officer in charge, OIC.</p> <p>Q. And was that the case at Abu Ghraib prison?</p> <p>A. Yes.</p> <p>Q. And were those the -- the noncommissioned officer in charge or the officer in charge, were those the individuals who CACI interrogators were ultimately responsible to report to for their day-to-day -- for the performance of their day-to-day responsibilities?</p> <p>A. Yeah.</p> <p>Q. Who -- I guess I'm just going to assume. Is it correct that the military chain of command were the individuals who gave instructions to CACI interrogators about how they conducted their interrogations?</p> <p>4/19/24 Trial Tr. at 16:24-17:24.</p>
	<p>Q. And if you would look at Paragraph 4, it says: "If you have a complaint, take it to your CACI leadership. Do not complain about CACI issues in front of government personnel." What do you understand that to mean?</p> <p>A. So that meant things like, if you had an issue with your pay, for example, don't complain to the military about it, tell</p>

	<p>me or your site lead about it so that we could take care of it administratively.</p> <p>Q. And who would the -- well, did this cover complaints regarding the actual performance of interrogations?</p> <p>A. No, this was purely administrative.</p> <p>Q. All right. And does the code of conduct include a statement about who sets the number of hours that CACI required -- CACI employees are required to work?</p> <p>A. Yes. That would be Paragraph 15, where it states, "Number of hours you work is set by the government."</p> <p>4/19/24 Trial Tr. at 21:9-24.</p> <p>Q. Okay. And you held CACI's top position in Iraq?</p> <p>A. From an administrative perspective, correct.</p> <p>THE COURT: Can you keep your voice up, please?</p> <p>THE WITNESS: Oh, yeah. Sorry.</p> <p>Q. Who was above you operationally, from a CACI point of view, in Iraq?</p> <p>A. Operationally, the military.</p> <p>Q. So you were CACI's top position in Iraq. Correct?</p> <p>A. For administrative and contractual matters.</p> <p>4/19/24 Trial Tr. at 43:6-14.</p> <p>Q. And so the interrogators who worked at night, they would report issues to Mr. Stefanowicz, and those interrogators who worked during the day, they would report issues to Mr. Porvaznik?</p> <p>A. Yes. CACI-related issues. If there was operational issues, they would report that through the military supervisor.</p> <p>4/19/24 Trial Tr. at 53:20-25.</p>
Daniel Porvaznik	<p>Q. Were you assigned as an interrogator at Abu Ghraib prison?</p> <p>A. Yes. Along with other duties, correct.</p> <p>Q. Let's talk about your other duties. What other duties did you have at Abu Ghraib prison?</p> <p>A. I was the site lead there, but also primarily my duties were administrative. As it turned out, I spent 98 percent of my time taking care of administrative duties.</p> <p>Q. And when you say administrative duties, what kind of things do you mean?</p>

	<p>A. They had to have computers, had to have office equipment, logistics of getting personnel back and forth from, say, Camp Victory to Abu Ghraib, and later on from Abu Ghraib to other sites. Getting ahold of ballistic vests, pay issues, getting insurance papers taken care of, emergency leave if it were to come up, housing, safe and secure housing. It took up a lot of time.</p> <p>Q. As a site lead, did you have any supervisory role over the way that CACI interrogators conducted the interrogation mission?</p> <p>A. No.</p> <p>Q. Who performed that supervisory role?</p> <p>A. Well, in general, the U.S. Army; more specifically, that would have been Captain Wood and some of her chief warrant officers.</p> <p>4/19/24 Trial Tr. at 87:5-88:2.</p> <p>Q. You also would advise CACI interrogators on how to carry out their job responsibilities. Isn't that right?</p> <p>A. How to carry it out?</p> <p>Q. Yes.</p> <p>A. No.</p> <p>4/19/24 Trial Tr. at 104:9-13.</p>
<p>Capt. Wood (Holmes)</p>	<p>Q. Okay. Turning to the CACI site manager, who was that? Do you remember?</p> <p>A. It was Dan Porvaznik.</p> <p>Q. Okay. And do -- do you have any concept of what his duties were at Abu Ghraib?</p> <p>A. From my understanding, he was just kind of an administrative go-to guy, so if I had any issues with any of the CACI personnel, I would go to him, positive, negative, if a -- any leaves -- when -- when his guys went on leave, it was coordinated through him. And we sat down -- so he was, for lack of a better term, their NCOIC, so just kind of their officer in charge or their noncommissioned officer in charge, in military terms. So he was an administrative person in charge that represented CACI.</p> <p>Q. And when you say administrative person in charge, did he make any decisions regarding</p>

	<p>interrogation operations?</p> <p>A. As far as policy or as far as teams or as far as what?</p> <p>Q. Any -- did he make any operational decisions, who would interrogate someone, who would be --</p> <p>A. No.</p> <p>Q. Okay. Did he receive any reports or any interrogation plans?</p> <p>A. He was not approving authority for them, no.</p> <p>Q. Do you know if he had any authority over interrogations?</p> <p>A. No, not as far as the mission itself, no.</p> <p>Q. So when you say, "administrative issues," you mean sort of corporate issues, like leave and things of that nature?</p> <p>A. Yeah.</p> <p>Dkt. #1600 (Ex. E) at 12-13.</p>
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CACI management had no role in establishing and were not advised as to intelligence priorities, operational rules or procedures, or detainee conditions of confinement.	
Steve Stefanowicz	<p>Q. Were CACI managers in the United States advised as to intelligence priorities and interrogation rules of engagement?</p> <p>A. No.</p> <p>Dkt. #1598 (Ex. A) at 20.</p>
	<p>Q. Do you remember a CACI executive named Chuck Mudd?</p> <p>A. Yes.</p> <p>Q. Did he ever visit Abu Ghraib prison?</p> <p>A. I only remember having him there once. Not me having him. He was there doing a site visit of staff.</p> <p>Q. Did Chuck Mudd have any role in interrogation operations?</p> <p>A. No.</p> <p>Dkt. #1598 (Ex. A) at 20.</p>
Army Interrogator C	<p>Q. Did CACI personnel have any role in assigning a detainee to you for interrogation?</p> <p>A. Not that I know of.</p> <p>Q. Did CACI personnel have any role in dictating the conditions of confinement for any detainee who was assigned to you for interrogation?</p> <p>A. Not any detainee that I knew or that I know of, no.</p> <p>Q. And did CACI personnel have any role in deciding how detainees assigned to you were treated while they were in custody?</p> <p>A. No.</p> <p>Q. Did CACI personnel have any role in selecting the interrogation approaches or techniques that you used in interrogations?</p> <p>A. No.</p> <p>Q. Did CACI personnel have any role in deciding whether to approve your interrogation plans?</p> <p>A. No.</p>

	<p>Q. Did CACI personnel have any role in deciding your intelligence priorities for an interrogation?</p> <p>A. No.</p> <p>Q. Did CACI personnel have any role in deciding how you conducted yourself during an interrogation?</p> <p>A. No.</p> <p>Q. Did CACI personnel have any role in deciding how other members of your Tiger Teams conducted themselves during an interrogation?</p> <p>A. No.</p> <p>Dkt. #1598 (Ex. B) at 9-10.</p>
Charles Mudd	<p>Q Prior to the photographs of the abuse being published, had you read the Interrogation Rules of Engagement?</p> <p>A I do not remember reading them before then, no.</p> <p>4/18/24 Trial Tr. at 101:2-4.</p>
Daniel Porvaznik	<p>Q. Did CACI have any role in establishing the interrogation rules of engagement at Abu Ghraib?</p> <p>A. Absolutely not.</p> <p>4/19/24 Trial Tr. at 90:10-12.</p>

CACI management had no role in investigating detainee abuse at Abu Ghraib; allegations of abuse were reported to the U.S. Army.	
Torin Nelson	<p>Q. Did you share the concerns that you had about Mr. Dugan and Mr. DJ with CACI?</p> <p>A. Specifically, no. Again, it was an ongoing investigation by the CID. I gave the proper investigators the information that I knew, with the reasoning that if they were to find something that really concerned them or upset them, then they would let the contractors who were supporting them know about their findings.</p> <p>4/15/24 PM Trial Tr. at 119:6-13.</p>
Arnold Morse	<p>Q. Mr. LoBue had a number of questions for you about this document. Has CACI ever had access to the complete Taguba report, that is, the report itself as well as the annexes or exhibits, the underlying interview memos, and the other documents on which this report is based?</p> <p>A. No.</p> <p>Dkt. #1591 at 94.</p>
Steve Stefanowicz	<p>Q. Okay. What did you see?</p> <p>A. I saw a detainee being walked back by -- escorted by Army personnel to that compound area, and they were naked.</p> <p>Q. What did you do, if anything?</p> <p>A. We reported it immediately to the chain of command within the ICE.</p> <p>Q. The chain of command within ICE, is that Army personnel?</p> <p>A. The Army personnel, absolutely.</p> <p>Dkt. #1598 (Ex. A) at 11.</p>
Charles Mudd	<p>Q Did you interview the CACI employees that were interrogators at Abu Ghraib?</p> <p>A No. The main why we did not, there was investigations going on. We did not want to do anything that would cause a</p> <p>Q And some of your employees shared with you that they had been told not to share the information --</p>

	<p>A Yeah. Q -- with you? A Yes. Q Did you ever ask the military whether it was permissible for you to conduct an internal investigation of your own employees' conduct? A No and yes. We would go to the COR and say are any of our employees in trouble? Is there anything we should be doing? Up until the actual reports come out naming certain employees, we were told by the COR that, no, your CACI employees are not in any type of trouble.</p> <p>4/18/24 Trial Tr. at 110:22-111:25.</p>
<p>Scott Northrup</p>	<p>Q. Yes. As far as you understood the policy, did the -- did the CACI employees have any additional responsibility -- if -- a CACI employee who observed abuse, did he have any additional responsibility other than reporting it either to the appropriate military personnel or -- and to you? A. I would think that would be -- my understanding is that would be determined by the local military leadership as well as the COR, as to the next steps they would want that person to take.</p> <p>4/19/24 Trial Tr. at 22:12-20.</p>
<p>Daniel Porvaznik</p>	<p>Q. What would you have done if you had seen a CACI employee abusing a detainee? A. I would have ensured that that activity was ceased immediately, and then reported it up, well, to the Army. Q. Did you ever see an Army interrogator abuse a detainee? A. I did not. Q. What would you have done if you had seen an Army interrogator abusing a detainee? A. Likewise, I would have ceased the activity and reported it to more senior military personnel at Abu Ghraib or the JIDC.</p> <p>4/19/24 Trial Tr. at 89:5-14.</p>
	<p>Q. And if you advised a CACI interrogator not to proceed with an interrogation technique that violated the Geneva Convention, and then they went ahead and did so, you had the ability to discipline that employee. Right?</p>

	<p>A. I would have had to bring it to the attention of the Army. If there was a violation of the Conventions, yes -- any violation of the Geneva Conventions or incorrect use of the interrogation rules of engagement, again, I would have to take that to the client.</p> <p>4/19/24 Trial Tr. at 105:17-25.</p>
CACI Interrogator A	<p>Q. Did you do anything -- well, did you tell anyone about what you had seen with the two Army tiger team members stripping a detainee down to a pair of female underwear?</p> <p>THE WITNESS: Yes.</p> <p>Q. What did you do?</p> <p>THE WITNESS: I told my section sergeant and I told Captain Wood.</p> <p>Dkt. #1600 (Ex. C) at 6.</p>

CACI management in the United States were not informed about interrogation operations at Abu Ghraib, including the work performed by CACI interrogators.	
Amy Jensen Monahan	<p>Q. And were you personally also aware of what it was the military wanted the CACI employees to be doing?</p> <p>A. No. Not anything other than the statement of work.</p> <p>Q. So, for example, you did not see the memorandums of understanding that were -- that were disseminated by the military in Iraq?</p> <p>A. That's correct.</p> <p>Dkt. #1591 at 6-7.</p>
Steve Stefanowicz	<p>Q. What role did CACI management in the United States have with respect to interrogation operations?</p> <p>A. Oh. None.</p> <p>Q. Did you brief CACI management in the United States on operational matters?</p> <p>A. No.</p> <p>Q. Were CACI management in the United States advised as to who each CACI interrogator was interrogating?</p> <p>A. No.</p> <p>Q. Were CACI managers in the United States given operational plans or reports?</p> <p>A. No.</p> <p>Dkt. #1598 (Ex. A) at 19.</p>
Mark Billings	<p>Q Did CACI management in Virginia have any role in directing or supervising the interrogation and intelligence collection efforts?</p> <p>A No.</p> <p>Q Who did that?</p> <p>A The United States Army.</p> <p>Q Did CACI management in Virginia receive operational reports on the intelligence collection efforts in Iraq?</p> <p>A No. We received no operational intelligence. You've got to remember, most of that information would be</p>

	<p>classified, and it would not be something to be shared.</p> <p>Q Did CACI management even know who its interrogators were assigned to interrogate in Iraq?</p> <p>A No. We had no idea. We knew where they were, that was it.</p> <p>Q Did CACI management ever know what substantive intelligence was being gathered in these interrogations?</p> <p>A No.</p> <p>Q What sort of support did CACI management in Virginia provide to the interrogators, analysts and screeners in Iraq?</p> <p>A Again, it's just administrative types of things. We made sure that their time sheets got annotated and forwarded, that they got to take their R&R and vacation when it came time to do that. We supported -- or assisted in transportation to come from Iraq. Those types of things.</p> <p>4/18/24 Trial Tr. at 26:8-27:8.</p>
<p>CACI Interrogator G</p>	<p>Q. During the time that you were at Abu Ghraib Prison, did you interact at all with CACI personnel who were back in the United States?</p> <p>A. No.</p> <p>Q. Did you do any reporting regarding the operational mission to go back to the CACI personnel in the United States?</p> <p>A. No.</p> <p>Q. When you finished an interrogation, did you have to prepare an interrogation report?</p> <p>A. Yes.</p> <p>Q. Who did that get submitted to?</p> <p>THE WITNESS: The U.S. military personnel.</p> <p>BY MR. O'CONNOR:</p> <p>Q. Did you submit your interrogation reports to CACI personnel for their review or approval?</p> <p>A. No.</p> <p>Dkt. #1598 (Ex. C) at 26-27.</p>
<p>Col. Pappas</p>	<p>Q. Okay. In your position related to the Interrogation Center, did you take any instruction from CACI management in the United States?</p>

	<p>A. No.</p> <p>Dkt. #1600 (Ex. B) at 5-6.</p> <p>Q. Are you aware of anyone consulting CACI management in the United States about the decision to bring in military dogs?</p> <p>A. I'm not aware of it, ma'am.</p> <p>Dkt. #1600 (Ex. B) at 7.</p> <p>Q. Did -- the military chain of command that reviewed interrogation plans at Abu Ghraib, did they take direction from CACI management in the United States about what to allow in interrogation plans?</p> <p>A. I don't believe so, no.</p> <p>Q. Did you ever have an instance where you saw that that happened?</p> <p>A. No.</p> <p>Dkt. #1600 (Ex. B) at 20.</p>
<p>CACI Interrogator A</p>	<p>Q. During the time that you were working at Abu Ghraib Prison, did you interact with CACI personnel who were working back in the United States?</p> <p>A. Yes.</p> <p>Q. Did you interact with CACI personnel who were working in the United States for anything other than administrative matters?</p> <p>A. No.</p> <p>Q. Do you remember who you interacted with that was working back in the United States?</p> <p>A. No.</p> <p>Q. Do you remember interacting with Amy Jensen Monaghan?</p> <p>A. Yes. It was just Jensen back then, I think.</p> <p>Q. Do you remember, other than her, was there anyone else back in the United States that you dealt with?</p> <p>A. Yes, HR, females.</p> <p>Q. Did you report to CACI personnel working in the United States about anything relating to the</p>

	<p>conduct of interrogations at Abu Ghraib Prison?</p> <p>A. No.</p> <p>Q. When you completed an interrogation, did you report to CACI personnel in the United States in any way about how the interrogation went?</p> <p>A. No.</p> <p>Dkt. #1600 (Ex. C) at 14-15.</p>
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